

BATHAEE DUNNE LLP

Yavar Bathaee (CA 282388)
Andrew C. Wolinsky (CA 345965)
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835
yavar@bathaeedunne.com
awolinsky@bathaeedunne.com

BATHAEE DUNNE LLP

Brian J. Dunne (CA 275689)
Edward M. Grauman (admitted *pro hac vice*)
901 S. MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
Tel.: (213) 462-2772
bdunne@bathaeedunne.com
egrauman@bathaeedunne.com

*Interim Co-Lead Counsel for the Advertiser
Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**

Amanda F. Lawrence (admitted *pro hac vice*)
Patrick J. McGahan (admitted *pro hac vice*)
Michael P. Srodoski (admitted *pro hac vice*)
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537
alawrence@scott-scott.com
pmcgahan@scott-scott.com
msrodoski@scott-scott.com

**SCOTT+SCOTT ATTORNEYS AT LAW
LLP**

Patrick J. Coughlin (CA 111070)
Carmen A. Medici (CA 248417)
Hal D. Cunningham (CA 243048)
Daniel J. Brockwell (CA 335983)
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565
pcoughlin@scott-scott.com
cmedici@scott-scott.com
hcunningham@scott-scott.com
dbrockwell@scott-scott.com

[Additional counsel on signature page.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Consolidated Case No. 3:20-cv-08570-JD

Hon. James Donato

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Pursuant to Civil Local Rule 79-5(f), Plaintiffs hereby file this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed. Per the accompanying Declaration of Amanda F. Lawrence, certain documents and information referenced in the concurrently filed discovery dispute letter have been designated by Defendant Meta Platforms, Inc. ("Meta Platforms"), as "Confidential" or "Highly Confidential" under the Stipulated Protective Order (ECF No. 314).

Portions of the discovery dispute letter referencing or reflecting the contents of the designated as-confidential documents and information have been redacted from the publicly filed version of the letter, and an unredacted version of the letter with the references highlighted is filed herewith. *See* Civ. L.R. 79-5(e), 79-5(f)(1).

Plaintiffs respectfully request that the Court grant their motion to consider whether the above-referenced Meta Platforms material should be sealed.

DATED: April 18, 2023

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

s/ Amanda F. Lawrence
 Amanda F. Lawrence (admitted *pro hac vice*)
 Patrick J. McGahan (admitted *pro hac vice*)
 Michael P. Srodoski (admitted *pro hac vice*)
 156 South Main Street, P.O. Box 192
 Colchester, CT 06415
 (860) 537-5537
 alawrence@scott-scott.com
 pmcgahan@scott-scott.com
 msrodoski@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Patrick J. Coughlin (CA 111070)
 Carmen A. Medici (CA 248417)
 Hal D. Cunningham (CA 243048)
 Daniel J. Brockwell (CA 335983)
 600 W. Broadway, Suite 3300
 San Diego, CA 92101
 (619) 233-4565
 pcoughlin@scott-scott.com
 cmedici@scott-scott.com
 hcunningham@scott-scott.com
 dbrockwell@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Thomas K. Boardman (CA 276313)
Patrick J. Rodriguez (*pro hac vice*)
230 Park Avenue, 17th Floor
New York, NY 10169
(212) 223-6444
tboardman@scott-scott.com
prodriguez@scott-scott.com

BATHAE DUNNE LLP

Yavar Bathae (CA 282388)
Andrew C. Wolinsky (admitted *pro hac vice*)
Adam Ernette (admitted *pro hac vice*)
Priscilla Ghita (admitted *pro hac vice*)
Chang Hahn (admitted *pro hac vice*)
445 Park Avenue, 9th Floor
New York, NY 10022
(332) 322-8835
yavar@bathaeedunne.com
awolinsky@bathaeedunne.com
aernette@bathaeedunne.com
pghita@bathaeedunne.com
chahn@bathaeedunne.com

BATHAE DUNNE LLP

Brian J. Dunne (CA 275689)
Edward M. Grauman (admitted *pro hac vice*)
Andrew M. Williamson (CA 344695)
901 S. MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
(213) 462-2772
bdunne@bathaeedunne.com
egrauman@bathaeedunne.com
awilliamson@bathaeedunne.com

BATHAE DUNNE LLP

Allison Watson Cross (CA 328596)
3420 Bristol St., Ste 600
Costa Mesa, CA 92626-7133
across@bathaeedunne.com

*Interim Co-Lead Counsel for the Advertiser
Classes*

LEVIN SEDRAN & BERMAN LLP

Keith J. Verrier (admitted *pro hac vice*)
Austin B. Cohen (admitted *pro hac vice*)
510 Walnut Street, Suite 500
Philadelphia, PA 19106-3997
(215) 592-1500
kverrier@lfsblaw.com
acohen@lfsblaw.com

AHDOOT & WOLFSON, PC

Tina Wolfson (CA 174806)

Robert Ahdoot (CA 172098)

Theodore W. Maya (CA 223242)

Henry Kelston (admitted *pro hac vice*)

2600 West Olive Avenue, Suite 500

Burbank, CA 91505

(310) 474-9111

twolfson@ahdootwolfson.com

rahdoot@ahdootwolfson.com

tmaya@ahdootwolfson.com

hkelston@ahdootwolfson.com

*Executive Committee Counsel for the Advertiser
Classes*